

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JACOB D. MILLER

Criminal No. 25-mj-3059-KAR

**AFFIDAVIT OF SPECIAL AGENT DEREK BOUCHER IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Derek Boucher, state:

Introduction and Agent Background

1. Since 2006, I have served as a Special Agent with the Federal Bureau of Investigation ("FBI"). As a Special Agent, I am responsible for the investigation of federal criminal offenses.

2. Since 2020, I have also been assigned to the FBI's Boston Division Springfield Resident Agency Joint Terrorism Task Force ("JTTF"). As a member of the JTTF, I work with agents and officers investigating crimes involving both domestic and international terrorism as well as national security violations.

3. I have conducted and participated in criminal investigations that have resulted in arrests for crimes involving threatening communications, violations of the National Firearms Act, child exploitation, color of law violations, controlled substance violations, financial crimes, and terrorism violations. I have personally been involved in the execution of numerous state and federal search and arrest warrants that have led to the conviction of many individuals.

4. Prior to working for the FBI's Boston Division, I was the Supervisory Special Agent in the FBI's Philadelphia Division, Harrisburg Resident Agency, where I managed the JTTF, counterintelligence, and cyber investigations from 2015-2019. During 2013-2014, I was a Supervisory Special Agent in the FBI's Counterterrorism Division Headquarters program, where I managed international terrorism investigations. From 2007-2010 and 2011-2013, I was a Special Agent in the Philadelphia Division's JTTF, where I investigated international and domestic Terrorism. From 2010-2011, I was a Special Agent in Afghanistan, where I investigated international contract corruption.

5. I respectfully submit this Affidavit in support of the Government's motion for pretrial detention of Jacob D. Miller ("Miller").

6. The facts in this Affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show merely that there is a basis for the Government's motion for pretrial detention and does not set forth all of my knowledge about this matter.

The Search of Miller's Residence on April 8, 2025

7. As set forth in the Affidavit of FBI Special Agent Dustin Farivar Based in support of Miller's Criminal Complaint (D.4), on April 8, 2025 at approximately 6:00 a.m., members of the FBI executed the search warrant for the Miller Residence. During the execution of the search warrant, FBI agents located a box of approximately fifty rounds of Federal brand, American Eagle .45 auto, 230 grain ammunition inside the bedside table of Miller's bedroom. *Id.*, ¶¶ 9-10.

8. FBI agents also located in a hallway closet safe the following six firearms:

a. Remington Model 514

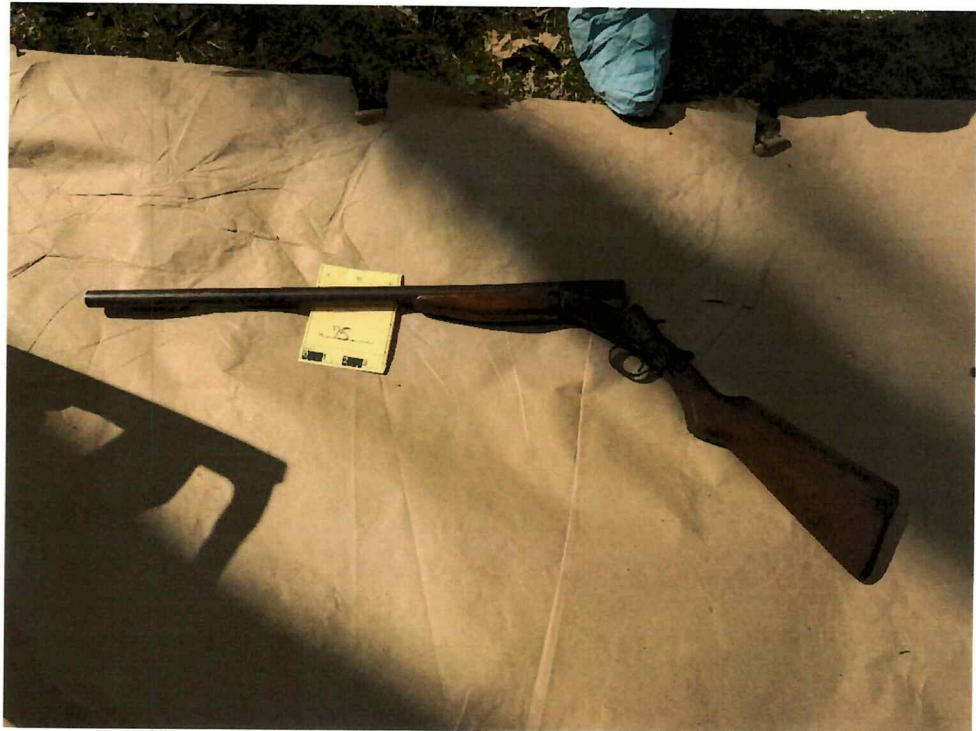
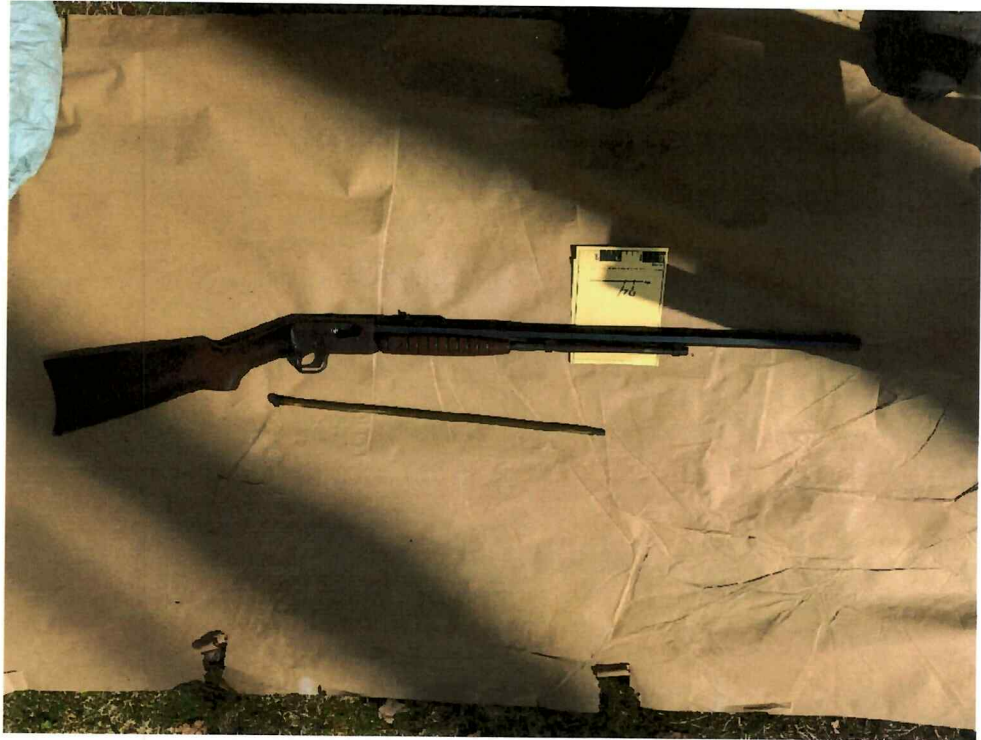
- b. J Stevens Arms Company Single Gun
- c. Remington Sportsmaster Model 511
- d. O.F. Mossberg and Sons No. 44B
- e. Marlin Family Firearms Company, Serial No. V314525
- f. Remington Model 12C, .22 Rifle, Serial No. 497525

Id., ¶¶ 12-14.

9. Photographs of these firearms are set forth below:









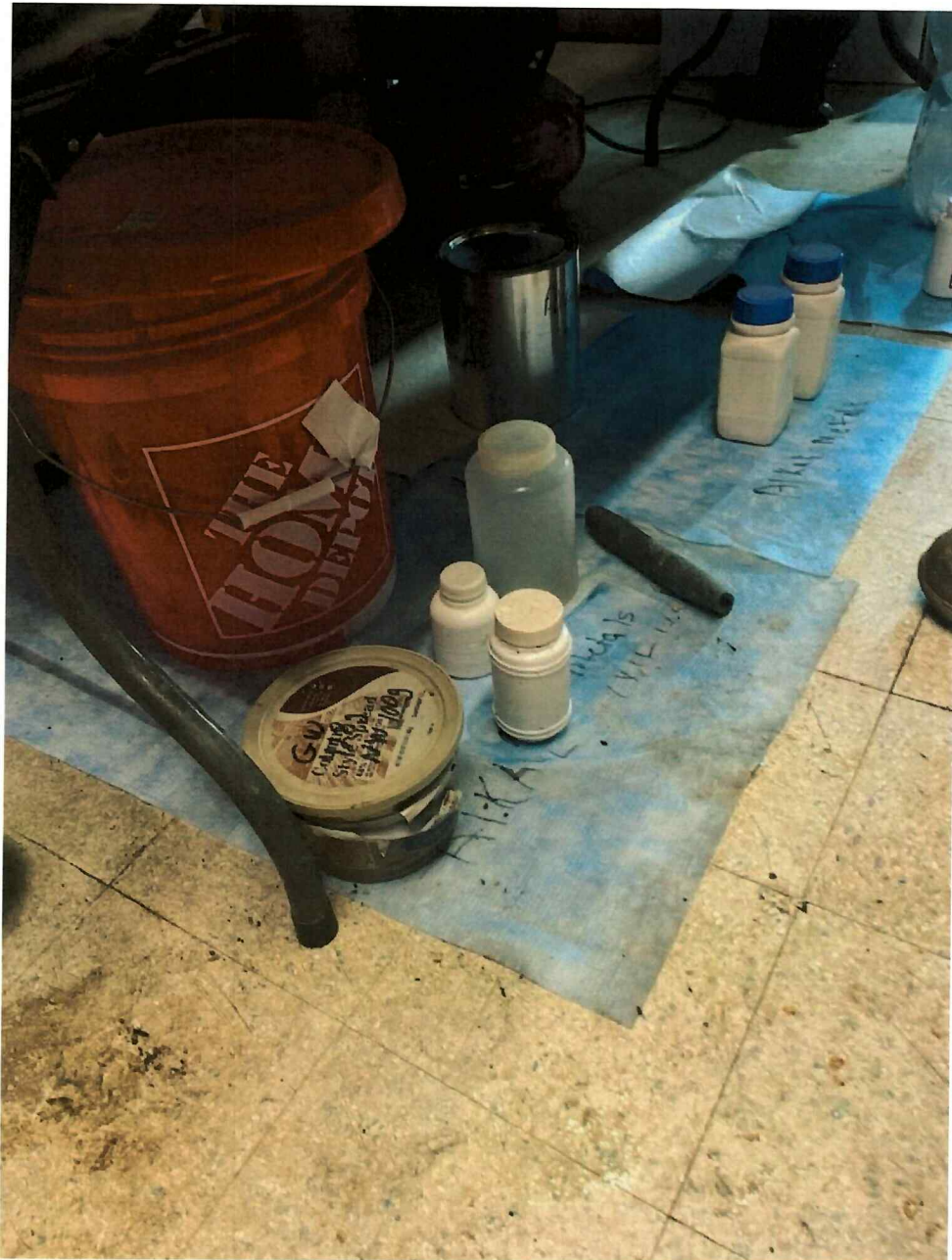
10. In addition, agents located in Miller's basement a FedEx box addressed from an individual in Illinois to an individual (not Miller) in Belchertown, MA. The shipping label describes the item as "1 box, Na0027, black powder for small arms, 4.1,1, 5lbs FLAMMABLE SOLID." I reviewed the contents of that box, which consisted of numerous plastic containers of black powder marked with labels that describe the contents as black powder.

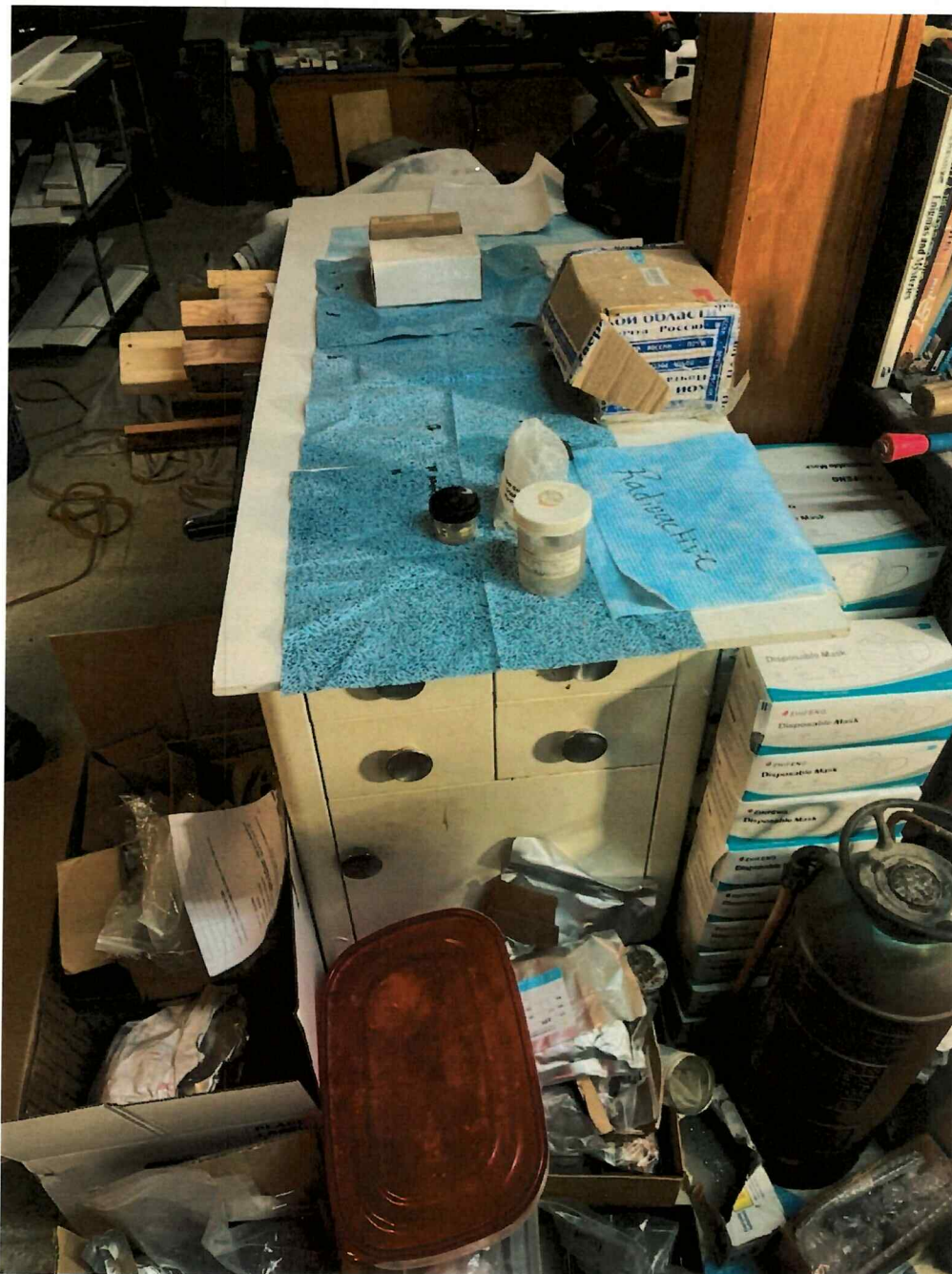
11. Prior to leaving Miller's residence, FBI personnel took exit photographs of the various room in the state that they were leaving behind. The following exit photographs depict various suspected hazardous substances in the basement:



MassDEP's Examination of Miller's Residence on April 10, 2025

12. At approximately 9:00 a.m. on April 10, 2025, MassDEP personnel began to examine Miller's residence to remove any hazardous substances. They photographed the same areas as the FBI did in their exit photographs. Two of these photographs are set forth below.





13. I have compared the photographs taken by the FBI as they exited Miller's residence of April 8, 2025 with the photograph taken by the MassDEP on April 10, 2025. It appears that

many containers were moved or removed from their locations.¹

14. According to the MassDEP personnel, the following items appeared to have been missing from the residence entirely based upon their search:²

- a. Potassium chlorate. According to the MassDEP, this is a precursor chemical that can be used to manufacture explosives.
- b. UN³ 1956.
- c. UN 1393
- d. UN 1400.
- e. Cobalt Metal Broken Cathode.
- f. Yttrbium, small vial
- g. Lu, small cube (Lutetium)
- h. Rhenium
- i. Nickel Foam
- j. Sodium, vial.
- k. Cobalt Pillar, silver dollar sized

15. According to the MassDEP, they asked Miller whether there was any mercury in

¹ The MassDEP did conduct a comprehensive search of Miller's residence, but confined their examination to the basement.

² The FBI is continuing to investigate the nature and applications of the remaining items.

³ UN1956 refers to the United Nations identification number for Compressed Gas, N.O.S. (Not Otherwise Specified), a hazard class 2.2 non-flammable gas, used for regulatory compliance and transportation of such gases. See <https://www.adazonusa.com/d-o-t-un1956-non-flammable-gas-2-label-4-x4-dot-labels-un-195.html>.

the residence, and he replied that there was not, but MassDEP subsequently located approximately forty pounds of liquid mercury. A photograph of the mercury found by MassDEP is located below.



16. According to FBI Special Agent Joshua Canter, Weapons of Mass Coordinator for

the FBI's Boston Division:

- a. Mercury is highly toxic.
- b. Even small amounts of mercury can cause heavy metal poisoning.
- c. Even a small broken thermometer containing mercury should result in a hazmat response and cleanup.
- d. Due to the danger of mercury, manufacturers generally no longer make mercury-based thermometers for the sale to the general public.


17. According to MassDEP, Miller told them:

- a. He had these supplies for his business.
- b. He was a chemist and knew how to handle them.
- c. He did not want MassDEP to take his supplies.

18. The FBI's investigation into this matter, including the extent to which Miller may have removed hazardous substances after the execution of the search warrant on April 8, 2025 and/or after the initial appearance on April 9, 2025 is ongoing.

Conclusion

Sworn to under the pains and penalties of perjury,


Derek Boucher
Special Agent, Federal Bureau of
Investigation

April 10, 2025